

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Boston Edison Company)
Cambridge Electric Light Company)
Commonwealth Electric Company)

D.T.E. 03-121

**NSTAR ELECTRIC FIRST SET OF INFORMATION REQUESTS TO THE
SOLAR ENERGY BUSINESS ASSOCIATION OF NEW ENGLAND**

Instructions

The following instructions apply to this set of information requests and all subsequent information requests issued by NSTAR Electric in this proceeding.

1. Each request should be answered in writing on a separate page (paginated) with a recitation of the request, the identification number of the request (for example, NSTAR-SEBANE-1-1), the docket number of the case, the date of the response, and the preparer of the response or the name of the person responsible for the answer. Please mark each page of an answer with the identification number of the request. In addition, please clearly reference any attachments to a response with the number of the request to which it applies and include page numbers on all attachments.
2. Please do not wait for all responses to be completed before supplying answers, but instead please provide the answers as they are completed.
3. These information requests shall be deemed continuing in nature so as to require further supplementation if SEBANE or its witness receive or generate additional information within the scope of those requests between the time of the original response and the close of the record in these proceedings.
4. The terms used interchangeably within these information requests relating to "any and all", "documentation", "support", and "justification" mean provide all data, assumptions, and calculations relied on. Provide the source of and basis for all data and assumptions employed. Include all studies, drafts, memos, reports, and planning documents from which such data, estimates and assumptions were used. Provide and explain any and all supporting workpapers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phonographic records,

microfilm, microfiche, computer printouts, memoranda, letters, correspondence, handwritten notes, records and reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If the Respondent believes that any of these information requests are ambiguous or need clarification, please contact David Rosenzweig or Stephen August at (617) 951-1400 so that the requests can be clarified prior to the preparation of a written response.
7. If an answer provides a reference to another information response, please provide that response with the answer.
8. If a question refers to an information request of another party, please provide an answer with information that supplements the previous responses.

Information Requests

Information Requests Relating to the Pre-Filed Testimony of Mr. Greene

- NSTAR-SEBANE-1-1 Please provide copies of (1) any and all prefiled testimony or reports (including all associated exhibits and attachments) submitted by Mr. Greene to state and federal regulatory authorities from 1999 to the present; and (2) any and all transcripts of Mr. Greene's testimony at hearings (adjudicatory or non-adjudicatory) before state and federal regulatory authorities from 1999 to the present.
- NSTAR-SEBANE-1-2 Provide copies of any and all regulatory decisions addressing the issues covered by Mr. Greene in testimony provided in response to Information Request NSTAR-SEBANE-1-1. Identify the decision making authority, docket number, year of the decision, and any official citation to the decision.
- NSTAR-SEBANE-1-3 Please identify all documents relied upon by Mr. Greene in preparing this testimony. Please provide a copy of each identified document.
- NSTAR-SEBANE-1-4 Please provide a copy of any and all articles, papers, speeches or other reports prepared in whole or in part by Mr. Greene addressing, distributed generation, standby rates and/or rate design.

- NSTAR-SEBANE-1-5 Referring to page 8, lines 13-16, please provide a copy of the referenced "extensive spreadsheet model." Please provide a copy in both paper form and electronically. The electronic version should be in Excel format and show all inputs, formulas and linked sources.
- NSTAR-SEBANE-1-6 Referring to page 8, line 18 through 20, please provide: (a) a detailed explanation of the development of the load profiles set forth in Figures 1 through 4, including all assumptions, inputs and data sources (including, the manner in which the "load shapes available from ITRON, Inc." were used); and (b) a copy of all calculations, workpapers, spreadsheets or other documents that the model used to develop Figures 1 through 4. The copy should be provided both in paper form and electronically. The electronic version should be in Excel format and show all inputs, formulas and linked sources.
- NSTAR-SEBANE-1-7 Referring to page 9, lines 3-7, please provide the load profile for the referenced example in the format set forth in Figures 1 through 4. Include in this response: (a) a detailed explanation of the development of the load profiles, including all assumptions, inputs and data sources (including, the manner in which the "load shapes available from ITRON, Inc." were used); and (b) a copy of all calculations, workpapers, spreadsheets or other documents that were used to develop the figures. The copy should be provided both in paper form and electronically. The electronic version should be in Excel format and show all inputs, formulas and linked sources.
- NSTAR-SEBANE-1-8 Referring to page 12, lines 5-6, please provide the basis for the statement that the referenced capacity factor of 16.41 percent for the PV array "is typical of such systems in the Boston area. Please provide a copy of any and all documents that relate to this response.
- NSTAR-SEBANE-1-9 Referring to page 12, lines 7-9, please provide the referenced "[c]ost and operating data". Please provide a copy of any and all documents that relate to this response, including, but not limited to "industry reference documents" and any record of "discussions with regional PV generators".
- NSTAR-SEBANE-1-10 Referring to page 13, Table 1, please provide: (a) a detailed explanation of each calculation that resulted in the values set forth in the table; and (b) a copy of all

calculations, workpapers, spreadsheets or other documents that show each calculation that resulted in the values set forth in the table. The copy should be provided both in paper form and electronically. The electronic version should be in Excel format and show all inputs, formulas and linked sources.

- NSTAR-SEBANE-1-11 Referring to page 13, lines 5-8 and the reference to bill savings in the example being reduced by "16% to 26%", please provide data and calculations showing: (a) the percentage of savings that would remain; (b) the resulting dollar savings for the customer; and (c) the amount of energy (in kilowatthours) and demand (in kilowatts) that would be saved.
- NSTAR-SEBANE-1-12 Referring to page 14, lines 5-9, please provide the basis for the statements that the Boston Edison standby rate would reduce the internal rates of return for the PV installations from 12 percent to 10 percent for the large grocery store and from 14 percent to 11 percent for the large office building. Please provide a copy of all calculations, workpapers, spreadsheets or other documents that show each calculation. The copy should be provided both in paper form and electronically. The electronic version should be in Excel format and show all inputs, formulas and linked sources.
- NSTAR-SEBANE-1-13 Referring to page 14, lines 5-9, please provide the IRR that Mr. Greene believes is needed in order to convince customers to proceed with DG installations. Please provide supporting documentation for the specific IRR that Mr. Greene believes is necessary.
- NSTAR-SEBANE-1-14 Referring to page 16, Table 2, please provide: (a) a detailed explanation of each calculation that resulted in the values set forth in the table; and (b) a copy of all calculations, workpapers, spreadsheets or other documents that show each calculation that resulted in the values set forth in the table. The copy should be provided both in paper form and electronically. The electronic version should be in Excel format and show all inputs, formulas and linked sources.
- NSTAR-SEBANE-1-15 Referring to page 17, Table 3, please provide: (a) a detailed explanation of each calculation that resulted in the values set forth in the table; and (b) a copy of all calculations, workpapers, spreadsheets or other documents

that show each calculation that resulted in the values set forth in the table. The copy should be provided both in paper form and electronically. The electronic version should be in Excel format and show all inputs, formulas and linked sources.

NSTAR-SEBANE-1-16 Referring to page 18, Table 4, please provide: (a) a detailed explanation of each calculation that resulted in the values set forth in the table; and (b) a copy of all calculations, workpapers, spreadsheets or other documents that show each calculation that resulted in the values set forth in the table. The copy should be provided both in paper form and electronically. The electronic version should be in Excel format and show all inputs, formulas and linked sources.

NSTAR-SEBANE-1-17 Referring to page 19, Table 5, please provide: (a) a detailed explanation of each calculation that resulted in the values set forth in the table; and (b) a copy of all calculations, workpapers, spreadsheets or other documents that show each calculation that resulted in the values set forth in the table. The copy should be provided both in paper form and electronically. The electronic version should be in Excel format and show all inputs, formulas and linked sources.

NSTAR-SEBANE-1-18 Referring to Mr. Greene's testimony on the application of standby rates to renewable sources of power (at pages 20-24), does Mr. Greene recommend that all sources of renewable power, as that term is defined in the Electric Restructuring Act of 1997, Chapter 164 of the Acts of 1997, should be exempt from paying standby service charges? Does Mr. Greene recommend that there should be any specific size threshold for such an exemption for renewable power? Does Mr. Greene recommend that such an exemption should be limited to only certain types of renewable power? Please explain in detail.

NSTAR-SEBANE-1-19 Referring to page 19 and Mr. Greene's statements regarding "exit fees" and the provisions of G.L. c. 164, § 1G(g), is it Mr. Greene's opinion that NSTAR Electric's proposed standby rates are "exit fees" within the meaning of the cited statutory provision? Please provide the basis for Mr. Greene's opinion.